

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.

Defendants.

Case No. 2:23-CV-00103-JRG-RSP

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND DOCKET CONTROL ORDER

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung”), (collectively, the “Parties”) respectfully file this Joint Motion to Amend the Docket Control Order and would show the Court as follows:

The current deadline for the Parties to complete fact discovery is September 10, 2024. The Parties request a brief extension of this deadline to accommodate additional depositions that were not able to be scheduled until at or after the current close of fact discovery. The Parties similarly request brief extensions to the current deadlines for opening expert reports, rebuttal expert reports, and the close of expert discovery to enable the Parties to prepare fulsome expert reports that address discovery provided at or after the current close of fact discovery. Neither the deadline for dispositive/*Daubert* motions, nor any other deadlines will be affected by these amendments.

The Parties represent that this Motion is not filed for the purposes of delay but rather so that justice may be served. The Parties have met and conferred and are jointly seeking the relief sought in this Motion.

Accordingly, the Parties respectfully request that the Court grant this Joint Motion to Amend the Docket Control Order (Dkt. No. 113) as follows:

Original Date	Amended Date	Event
October 15, 2024	October 21, 2024	Deadline to Complete Expert Discovery
October 3, 2024	October 14, 2024	Serve Disclosures for Rebuttal Expert Witnesses
September 16, 2024	September 26, 2024	Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof
September 10, 2024	September 20, 2024	Deadline to Complete Fact Discovery
September 10, 2024		File Motions to Compel Discovery

Dated: September 9, 2024

Respectfully submitted,

By: /s/ Marc Fenster

By: /s/ Katherine D. Prescott

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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and counsel for Defendants have complied with the meet and confer requirements of Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster

Marc Fenster

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 9, 2024

/s/ Marc Fenster

Marc Fenster